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U.S. DISTRICT COURT
DISTRICT OF MASS.

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DEBORAH CHIN, Individually and On Behalf)	Civil Action No. 04-CV-10294-DPW
of All Others Similarly Situated,)
)
Plaintiff,)
)
vs.)
)
SONUS NETWORKS, INC., et al.,)
)
Defendants.)
)
_____)
MICHELLE TREBITSCH, On Behalf of	Civil Action No. 04-CV-10307-DPW
Herself and All Others Similarly Situated,)
)
Plaintiff,)
)
vs.)
)
SONUS NETWORKS, INC., et al.,)
)
Defendants.)
)
_____)

[Caption continued on following page.]

GLOBAL UNDERVALUED SECURITIES MASTER FUND'S NOTICE OF MOTION AND
MOTION TO BE APPOINTED LEAD PLAINTIFF PURSUANT TO §21D(A)(3)(B) OF THE
SECURITIES EXCHANGE ACT OF 1934 AND FOR APPOINTMENT OF LEAD COUNSEL

INFORMATION DYNAMICS, LLC, On
Behalf of Itself and All Others Similarly
Situating,

Plaintiff,

vs.

SONUS NETWORKS, INC., et al.,

Defendants.

) Civil Action No. 04-CV-10308-DPW

) CLASS ACTION

PETER KALTMAN, On Behalf of Himself
and All Others Similarly Situated,

Plaintiff,

vs.

SONUS NETWORKS, INC., et al.,

Defendants.

) Civil Action No. 04-CV-10309-DPW

) CLASS ACTION

SAMANTHA DEN, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

SONUS NETWORKS, INC., et al.,

Defendants.

) Civil Action No. 04-CV-10310-DPW

) CLASS ACTION

[Caption continued on following page.]

RICHARD CURTIS, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

SONUS NETWORKS, INC., et al.,

Defendants.

Civil Action No. 04-CV-10314-MLW

CLASS ACTION

RONALD KASSOVER, On Behalf of the
Ronald Kassover IRA and All Others Similarly
Situating,

Plaintiff,

vs.

SONUS NETWORKS, INC., et al.,

Defendants.

Civil Action No. 04-CV-10329-DPW

CLASS ACTION

STEVE L. BAKER, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

SONUS NETWORKS, INC., et al.,

Defendants.

Civil Action No. 04-CV-10333-DPW

CLASS ACTION

[Caption continued on following page.]

MICHAEL KAFFEE, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

SONUS NETWORKS, INC., et al.,

Defendants.

) Civil Action No. 04-CV-10345-DPW

) CLASS ACTION

HAIMING HU, Individually and On Behalf of
All Others Similarly Situated,

Plaintiff,

vs.

SONUS NETWORKS, INC., et al.,

Defendants.

) Civil Action No. 04-CV-10346-DPW

) CLASS ACTION

CHARLES STARBUCK, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

SONUS NETWORKS, INC., et al.,

Defendants.

) Civil Action No. 04-CV-10362-DPW

) CLASS ACTION

[Caption continued on following page.]

SAMUEL HO, Individually and On Behalf of) Civil Action No. 04-CV-10363-DPW
All Others Similarly Situated,)
) CLASS ACTION
Plaintiff,)

vs.)

SONUS NETWORKS, INC., et al.,)
)
Defendants.)

JEFFREY C. RODRIGUES, Individually and) Civil Action No. 04-CV-10364-DPW
On Behalf of All Others Similarly Situated,)
) CLASS ACTION
Plaintiff,)

vs.)

SONUS NETWORKS, INC., et al.,)
)
Defendants.)

ROBERT CONTE and MARK RESPLER,) Civil Action No. 04-CV-10382-DPW
Themselves and On Behalf of All Others)
Similarly Situated,) CLASS ACTION

Plaintiffs,)

vs.)

SONUS NETWORKS, INC., et al.,)
)
Defendants.)

[Caption continued on following page.]

WHEATON ELECTRICAL SERVICES
RETIREMENT 401K PROFIT SHARING
PLAN, On Behalf of Itself and All Others
Similarly Situated,

Plaintiff,

vs.

SONUS NETWORKS, INC., et al.,

Defendants.

Civil Action No. 04-CV-10383-DPW

CLASS ACTION

BRIAN CLARK, Individually and On Behalf
of All Others Similarly Situated,

Plaintiff,

vs.

SONUS NETWORKS, INC., et al.,

Defendants.

Civil Action No. 04-CV-10454-DPW

CLASS ACTION

SHEILA BROWNELL, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

SONUS NETWORKS, INC., et al.,

Defendants.

Civil Action No. 04-CV-10597-DPW

CLASS ACTION

[Caption continued on following page.]

SAVERIO PUGLIESE, On Behalf of Himself)	Civil Action No. 04-CV-10612-DPW
and All Others Similarly Situated,)	
Plaintiff,)	<u>CLASS ACTION</u>
vs.)	
SONUS NETWORKS, INC., et al.,)	
Defendants.)	
<hr/>	
DAVID V. NOCITO, On Behalf of Himself)	Civil Action No. 04-CV-10623-DPW
and All Others Similarly Situated,)	
Plaintiff,)	<u>CLASS ACTION</u>
vs.)	
SONUS NETWORKS, INC., et al.,)	
Defendants.)	
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PLEASE TAKE NOTICE that the Global Undervalued Securities Master Fund ("Movant"), which purchased the common stock of Sonus Networks, Inc. ("Sonus" or the "Company") between April 9, 2003 and February 12, 2004 (the "Class Period"), hereby moves this Court for an order granting its Motion to Be Appointed Lead Plaintiff Pursuant to §21D(a)(3)(B) of the Securities Exchange Act of 1934 and for Appointment of Lead Counsel ("Motion").

This Motion is brought pursuant to §21D of the Securities Exchange Act of 1934 ("Exchange Act") and on the grounds that Movant has timely filed the instant motion and is the "most adequate plaintiff." In addition, Movant seeks the Court's approval of its selection of Darren J. Robbins and Travis E. Downs III of the law firm of Milberg Weiss Bershad Hynes & Lerach LLP as Lead Counsel and Melick, Porter & Shea LLP as Liaison Counsel for the class pursuant to §21D(a)(3)(B)(iv), 15 U.S.C. §78u-4(a)(3)(B)(iv).

This Motion is based upon this notice of motion, the accompanying memorandum in support thereof, the affidavit of John E. DeWick, the pleadings and other files and records in each of these actions, and such other written or oral argument as may be permitted by the Court at the hearing on this motion.¹

¹ Local Rule 7.1(a)(2) requires a conference of counsel prior to filing motions. Movant respectfully submits that this conferral requirement is unnecessary in the context of motions for lead plaintiff since movants have no way of knowing which other entities plan to move for appointment as lead plaintiff until after they have filed their motions. In addition, Local Rule 7.1(a)(2) may be inapplicable to motions for selection of lead plaintiff and approval of lead counsel because such motions are mandated by federal statute. Section 21D of the Exchange Act, as amended by the Private Securities Litigation Reform Act of 1995, sets forth the procedure that must be followed for the selection of lead plaintiff and approval of lead counsel. *See* 15 U.S.C. §§78u-4, *et seq.* Under these circumstances, Movant submits that the conferral requirement of Local Rule 7.1(a)(2) does not apply.

REQUEST FOR ORAL ARGUMENT

Pursuant to Local Rule 7.1(d), Movant hereby requests oral argument as to this Motion.

DATED: April 12, 2004

MELICK, PORTER & SHEA, LLP
RICHARD J. SHEA (BBO 456310)
JOHN E. DeWICK (BBO 654723)

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document
was served upon the attorney of record for each party by
mail on 4/12/04

John E. DeWick

John E. DeWick

JOHN E. DeWICK

28 State Street
Boston, MA 02109
Telephone: 617/523-6200
617/523-8130 (fax)

[Proposed] Liaison Counsel

MILBERG WEISS BERSHAD
HYNES & LERACH LLP
WILLIAM S. LERACH
DARREN J. ROBBINS
TRAVIS E. DOWNS III
RAMZI ABADOU
THOMAS E. GLYNN
401 B Street, Suite 1700
San Diego, CA 92101
Telephone: 619/231-1058
619/231-7423 (fax)

[Proposed] Lead Counsel for Plaintiffs

DECLARATION OF SERVICE BY MAIL

I, the undersigned, declare:

1. That declarant is and was, at all times herein mentioned, a citizen of the United States and a resident of the County of San Diego, over the age of 18 years, and not a party to or interest in the within action; that declarant's business address is 401 B Street, Suite 1700, San Diego, California 92101.

2. That on April 12, 2004, declarant served the GLOBAL UNDERVALUED SECURITIES MASTER FUND'S NOTICE OF MOTION AND MOTION TO BE APPOINTED LEAD PLAINTIFF PURSUANT TO §21D(A)(3)(B) OF THE SECURITIES EXCHANGE ACT OF 1934 AND FOR APPOINTMENT OF LEAD COUNSEL by depositing a true copy thereof in a United States mailbox at San Diego, California in a sealed envelope with postage thereon fully prepaid and addressed to the parties listed on the attached Service List.

3. That there is a regular communication by mail between the place of mailing and the places so addressed.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 12th day of April, 2004, at San Diego, California.


SHARON E. FORD

SONUS NETWORKS-CA

Service List - 4/6/2004 (04-0069)

Page 1 of 5

Counsel For Defendant(s)

John R. Baraniak, Jr.
Robert S. Frank, Jr.
Choate, Hall & Stewart
53 State Street, Exchange Place
Boston, MA 02109-2891
617/248-5000
617/248-4000(Fax)

James W. Prendergast
Jeffrey B. Rudman
Daniel W. Halston
Hale And Dorr
60 State Street
Boston, MA 02109
617/526-6000
617/526-5000(Fax)

Thomas J. Dougherty
Matthew J. Matule
Skadden, Arps, Slate, Meagher & Flom LLP
One Beacon Street
Boston, MA 02108
617/573-4800
617/573-4822(Fax)

Counsel For Plaintiff(s)

Jeffrey C. Block
Michael T. Matraia
Shannon L. Hopkins
Berman DeValerio Pease Tabacco Burt & Pucillo
One Liberty Square
Boston, MA 02109
617/542-8300
617/542-1194(Fax)

Evan J. Smith
Brodsky & Smith, LLC
333 E. City Avenue, Suite 602
Bala Cynwyd, PA 19004
610/667-6200
610/667-9029(Fax)

Samuel H. Rudman
David A. Rosenfeld
Mario Alba, Jr.
Cauley Geller Bowman & Rudman, LLP
200 Broadhollow Road, Suite 406
Melville, NY 11747
631/367-7100
631/367-1173(Fax)

Steven J. Toll
Daniel S. Sommers
Julie Goldsmith
Cohen, Milstein, Hausfeld & Toll, P.L.L.C.
1100 New York Ave., N.W., Suite 500
Washington, DC 20005-3964
202/408-4600
202/408-4699(Fax)

SONUS NETWORKS-CA

Service List - 4/6/2004 (04-0069)

Page 2 of 5

Jonathan M. Plasse
Goodkind Labaton Rudoff & Sucharow, LLP
100 Park Avenue, 12th Floor
New York, NY 10017-5563
212/907-0700
212/818-0477(Fax)

Brian M. Felgoise
Law Offices of Brian M. Felgoise
261 Old York Road, Suite 423
Jenkintown, PA 19046
215/886-1900

Bruce G. Murphy
Law Offices of Bruce G. Murphy
265 Llwyds Lane
Vero Beach, FL 32963
772/231-4202
772/234-0440(Fax)

Charles J. Piven
Law Offices of Charles J. Piven, P.A.
The World Trade Center
401 East Pratt Street, Suite 2525
Baltimore, MD 21202
410/332-0030
410/685-1300(Fax)

Marc S. Henzel
Law Offices of Marc S. Henzel
273 Montgomery Avenue, Suite 202
Bala Cynwyd, PA 19004
610/660-8000
610/660-8080(Fax)

Richard J. Vita
Law Offices of Richard J. Vita
77 Franklin Street, Suite 300
Boston, MA 02110
617/426-6566
617/357-1612(Fax)

Richard A. Lockridge
Karen H. Riebel
Lockridge Grindal Nauen, P.L.L.P.
100 Washington Avenue South, Suite 2200
Minneapolis, MN 55401
612/339-6900
612/339-0981(Fax)

Steven G. Schulman
Richard H. Weiss
Peter E. Seidman
Milberg Weiss Bershad Hynes & Lerach LLP
One Pennsylvania Plaza
New York, NY 10119
212/594-5300
212/868-1229(Fax)

SONUS NETWORKS-CA

Service List - 4/6/2004 (04-0069)

Page 3 of 5

William S. Lerach
Travis E. Downs III
Thomas E Glynn
Milberg Weiss Bershad Hynes & Lerach LLP
401 B Street, Suite 1700
San Diego, CA 92101-4297
619/231-1058
619/231-7423(Fax)

Nancy Freeman Gans
Moulton & Gans, P.C.
33 Broad Street, Suite 1100
Boston, MA 02109
617/369-7979
617/369-7980(Fax)

Eric J. Belfi
Murray Frank & Sailer, LLP
275 Madison Avenue, Suite 801
New York, NY 10016
212/682-1818
212/682-1892(Fax)

Laurence D. Paskowitz
Paskowitz & Associates
271 Madison Avenue, 20th Floor
New York, NY 10016
212/685-0969
212/685-2306(Fax)

Marc I. Gross
Joseph Gentile
Pomerantz Haudek Block Grossman & Gross
LLP
100 Park Avenue, 26th Floor
New York, NY 10017-5516
212/661-1100
212/661-8665(Fax)

M. Clay Ragsdale IV
Ragsdale & Frese LLC
1929 Third Avenue North
550 Farley Building
Birmingham, AL 35253-0924
205/251-4775
205/251-4777(Fax)

Roy L. Jacobs
Roy L. Jacobs Attorney At Law
60 East 42nd Street, 46th Floor
New York, NY 10165
212/867-1156
212/504-8343(Fax)

Andrew M. Schatz
Jeffrey S. Nobel
Nancy A. Kulesa
Schatz & Nobel, P.C.
One Corporate Center
20 Church Street, Suite 1700
Hartford, CT 06103
860/493-6292
860/493-6290(Fax)

SONUS NETWORKS-CA

Service List - 4/6/2004 (04-0069)

Page 4 of 5

Marc A. Topaz
Schiffirin & Barroway, LLP
Three Bala Plaza East, Suite 400
Bala Cynwyd, PA 19004
610/667-7706
610/667-7056(Fax)

Samuel P. Sporn
Christopher Lometti
Frank R. Schirripa
Schoengold & Sporn, P.C.
19 Fulton Street, Suite 406
New York, NY 10038
212/964-0046
212/267-8137(Fax)

Ralph M. Stone
Shalov Stone & Bonner LLP
485 Seventh Avenue, Suite 1000
New York, NY 10018
212/239-4340
212/239-4310(Fax)

Thomas G. Shapiro
Theodore M. Hess-Mahan
Shapiro Haber & Urmey, LLP
75 State Street
Boston, MA 02109
617/439-3939
617/439-0134(Fax)

Jules Brody
Stull, Stull & Brody
6 East 45th Street, 4th Floor
New York, NY 10017
212/687-7230
212/490-2022(Fax)

Robert I. Harwood
Samuel K. Rosen
Wechsler Harwood LLP
488 Madison Avenue, 8th Floor
New York, NY 10022
212/935-7400
212/753-3630(Fax)

Joseph H. Weiss
Jack I. Zwick
Weiss & Yourman
551 Fifth Avenue, Suite 1600
New York, NY 10176
212/682-3025
212/682-3010(Fax)

Marian P. Rosner
Michael A. Schwartz
Renee L. Karalian
Wolf Popper LLP
845 Third Avenue
New York, NY 10022
212/759-4600
212/486-2093(Fax)

SONUS NETWORKS-CA

Service List - 4/6/2004 (04-0069)

Page 5 of 5

Eduard Korsinsky
Zimmerman, Levi & Korsinsky, LLP
39 Broadway, Suite 1440
New York, NY 10006
212/363-7500
212/363-7171 (Fax)

Richard A. Speirs
Shaye Fuchs
Zwerling, Schachter & Zwerling, LLP
767 Third Avenue
New York, NY 10017-2023
212/223-3900
212/371-5969 (Fax)